

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE HURRY FAMILY REVOCABLE TRUST	:	
ALPINE SECURITIES CORPORATION; and	:	
SCOTTSDALE CAPITAL ADVISORS	:	
CORPORATION	:	
Plaintiffs,	:	Case No.
vs.	:	(M.D. Fla. Case No. 8:18-cv-02869)
CHRISTOPHER FRANKEL	:	
Defendant.	:	

NOTICE OF MOTION TO COMPEL VISION FINANCIAL MARKETS LLC'S COMPLIANCE WITH SUBPOENA

PLEASE TAKE NOTICE that upon the Declaration of Jordan Susman, dated October 28, 2019, and the accompanying Memorandum of Law in Support of Motion to Compel Vision Financial Markets LLC’s Compliance with Subpoena, Plaintiffs The Hurry Family Revocable Trust, Alpine Securities Corporation, and Scottsdale Capital Advisors (collectively, “Plaintiffs”) will move this Court, at a place and time that the Court will set, for an order pursuant to Rule 45 of the Federal Rules of Civil Procedure, compelling third party Vision Financial Markets, LLC (“Vision”) to produce documents in compliance with a subpoena (the “Subpoena”) issued in the above referenced action before the United States District Court for the Middle District of Florida, specifically in the case captioned *Hurry Family Revocable Trust, et al. v. Christopher Frankel*, 8:18CV02869(VMC/-CPT). Pursuant to Fed.R.Civ.P. 37(a)(1), counsel for Plaintiffs attempted

to meet and confer with counsel for Vision in a good faith effort to resolve Vision's refusal to comply with the Subpoena. Counsel for Vision refused to discuss the matter.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), opposition papers shall be served within fourteen (14) days after service of the moving papers, and reply papers shall be served within seven (7) days after service of the opposition papers.

WHEREFORE, Plaintiffs respectfully request an order compelling Third-Party Vision Financial Markets, LLC to produce documents in compliance with the Subpoena referenced herein.

Dated: October 28, 2019

Respectfully submitted,

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